

**United States Environmental Protection Agency  
Region V  
POLLUTION REPORT**

US EPA RECORDS CENTER REGION 5



436824

**Date:** Thursday, January 31, 2013

**From:** Kevin Turner

<b>To:</b> Kevin Turner, U. S. EPA Sherry Fielding, U. S. EPA Mark Durno, U. S. EPA John Maritote, U. S. EPA Mara McGinnis, Illinois EPA Bruce Everetts, Illinois EPA Pat Ryan, U. S. Coast Guard  John Hahn, U. S. Coast Guard Tom Binz, Professional Environmental Engineers, Inc.	Jason El-Zein, U. S. EPA Mindy Clements, U. S. EPA Mike Joyce, U. S. EPA Brian Barwick, U. S. EPA Chris Cahnovsky, Illinois EPA Michelle Kaysen, U.S. EPA Ginger Molitor, Fisheries & Wildlife Service  Tom Miller, IEPA EPA POLREPS for U. S. Coast Guard, U. S. Coast Guard
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**Subject:** POLREP #16  
Hartford Area Hydrocarbon Plume Site  
N. Olive Street, Hartford, IL  
Latitude: 38.8361210  
Longitude: -90.0951620

<b>POLREP No.:</b> 16	<b>Site #:</b> 524
<b>Reporting Period:</b> 11/17/2011 - 01/31/13	<b>D.O. #:</b>
<b>Start Date:</b> 10/20/2003	<b>Response Authority:</b> CERCLA/OPA
<b>Mob Date:</b>	<b>Response Type:</b> Non-Time-Critical
<b>Demob Date:</b>	<b>NPL Status:</b> Non NPL
<b>Completion Date:</b>	<b>Incident Category:</b> Removal
<b>CERCLIS ID #:</b>	<b>Assessment</b>
<b>RCRIS ID #:</b>	<b>Contract #</b>
<b>FPN#</b> E04503	<b>Reimbursable Account #</b>

**Site Description**

Please refer to POLREP's #1 and #4 for details.

**Current Activities**

Response activities to date:

After a series of meetings with the Hartford Work Group (HWG) respondents in the Summer/Fall of 2003, the U.S. EPA requested that Work Plans be submitted and site activities commence during negotiations of a final Administrative Order of Consent (AOC).

U.S. EPA and the U. S. Department of Justice (U.S. DOJ) in conjunction the Illinois Environmental Protection Agency are negotiating the next enforceable order (Consent Decree) with the Responsible Parties (RPs). The Consent Decree would require the RPs to create a "trust fund" to pay for the clean-up required by the Statement of Work (SOW). Under the Consent Decree, a contractor retained by Apex Oil would implement the SOW and the responsibility and costs of lead agency oversight would eventually shift to the Illinois Environmental Protection Agency. These privileged negotiations continue at this time.

#### Vapor Related Activities

Please refer to previous POLREPs for past vapor activities.

Total gallons of petroleum product removed by the SVE system to date is approximately 827,300 equivalent gallons.

Daily operations and maintenance activities occur on a daily basis.

#### Groundwater Related Activities

Please refer to previous POLREPs for past groundwater related activities.

There are 5 sentinel wells for the Village of Hartford drinking water wellhead protection purposes. The wells are sampled quarterly and results reported to the agencies.

A semi-annual groundwater monitoring occurred each January and June.

#### LNAPL Related Activities

Please refer to previous POLREPs for past free product (LNAPL) related activities.

Five Multi-Phase Extraction (MPE) wells were installed as part of the Area "A" Pilot Systems for removal of free-phase floating oil was completed in late 2008.

In November/December 2011, the Area "A" Pilot Study was conducted. This pilot study compared a variety of product removal technologies to support the forthcoming remedy selection.

A total of 25,422 gallons of petroleum products have been removed by skimming and Spill-Buddy recovery operations.

## General Project Activities

U.S. EPA has participated in the development of a formal program with the local fire department to prepare for and respond to vapor intrusions through the 911 emergency notification system.

Daily Mississippi River gauge data is collected and compared with site groundwater monitoring wells and pressure transducers to better understand the hydraulic connection of impacted waters of the State with the River, and, to better understand the potential threats to the Mississippi River via active and abandoned sewers and pipeline corridors leading to the Mississippi River and surrounding surface water bodies. Furthermore, water gauge data is used to better understand the groundwater flow and migration towards the Mississippi River in comparison to the influences upon the regional groundwater pumping/consumption usage.

## Community Relations Activities

The agencies will continue to disseminate information to the public as required and address any questions that may arise. Development of new "Fact Sheets" and the dissemination of such to members of the public are anticipated for every phase of clean-up.

Documents maintained by the U.S. EPA in the official Administrative Record were up dated in April 2010. The Information Repository at the Village of Hartford Public Library was updated in June of 2010. Adobe (PDF) versions of the project documents are available for public review during normal visiting hours at the Village of Hartford Library located on Hawthorne Street

## Enforcement Activities

The Administrative Order on Consent (AOC) was signed on March 17, 2004 and became effective on June 24, 2004.

U.S. EPA has concluded formal legal matters related to the United States Department of Justice in United States v. Apex Oil Company. On July 6, 2006, the United States District Court for the Southern District of Illinois granted the United States motion for partial summary judgment against the Apex Oil Company. The remaining issues were tried before the bench beginning January 7, 2008, with testimony completed on February 6, 2008. Ultimately, the U.S. DOJ/U.S. EPA received a favorable decision on July 28, 2008, which was confirmed by the 7th Circuit Court of Appeals on August 25, 2009. The Supreme Court denied Apex Oil's Petition for a Writ of Certiorari on October 4, 2010.

On July 20, 2010, U.S. EPA issued a Unilateral Administrative Order {(UAO) RCRA-05-2010-0020} to Apex Oil Company, BP America Inc., Shell Oil Company, Sinclair Oil Corporation, and The Valero Companies. The UAO is for work including implementation of a pilot test in Area "A", followed by continuous operation of a multiphase extraction system at that location, along with management of recovered vapors and liquids at treatment facilities located east of the Village of Hartford on property owned by Shell Oil Company.

## R5 Priorities Summary

This is an Integrated River Assessment.

Miles of river systems cleaned and/or restored: 0

Cubic yards of contaminated sediments removed and/or capped: 0

Gallons of oil/water recovered as of end of 2012: 852,722 gallons

Acres of soil/sediment cleaned up in floodplains and riverbanks: 0

## Stand Alone Assessment

Acres Protected: 19

Number of contaminated residential yards cleaned up: 0

Human Health Exposures Avoided: 368

Number of workers on site: 8

Contaminant(s) of Concern: Petroleum Products

## Planned Removal Actions

### Vapor Activities

Tedlar bag samples will be collected to make adjustments for SVE optimization.

Collected data may be used to temporarily shut down or reopen wells along E. Watkins Street.

### Groundwater Activities

Quarterly monitoring of the sentinel wells is on-going.

Semi-annual monitoring and gauging of selected monitoring wells is on-going.

### LNAPL Activities

A second Area "A" Pilot Study will be performed to evaluate hydrocarbon removal technologies in support to the development of a Final Remedy. The work related to this pilot study will be performed per the July 2010 Unilateral Administrative Order.

## Next Steps

### Vapor Activities

Tedlar bag samples will be collected to make adjustments for SVE optimization.

Collected data may be used to temporarily shut down or reopen wells along E. Watkins Street.

### Groundwater Activities

Quarterly monitoring of the sentinel wells is on-going.

Semi-annual monitoring and gauging of selected monitoring wells is on-going.

### LNAPL Activities

A second Area "A" Pilot Study will be performed to evaluate hydrocarbon removal technologies in support to the development of a Final Remedy. The work related to this pilot study will be performed per the July 2010 Unilateral Administrative Order.

### Key Issues

Because the current AOC defined scope of work is virtually completed, the U.S. DOJ/U.S. EPA/Illinois EPA are negotiating a Consent Decree which will define the future scope of work project expectations, remedies and schedule from all the identified project respondents.

As an interim measure, the current SVE system does not maintain 100% sub-surface control of petroleum vapors. The forthcoming remedy approach is hinged upon the addition of new vapor extraction wells along with the Area "A" Pilot Study for liquid petroleum capture and removal technology(s) best suited for site clean-up objectives.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
RST/START	\$1,350,000.00	\$1,067,522.00	\$282,478.00	20.92%
<b>Intramural Costs</b>				
USEPA - Direct (Region, HQ)	\$1,450,000.00	\$1,311,666.00	\$138,334.00	9.54%
<b>Total Site Costs</b>	<b>\$2,800,000.00</b>	<b>\$2,379,188.00</b>	<b>\$420,812.00</b>	<b>15.03%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.